

Hazardous Waste Management

Hazardous Waste Personnel Training for Large Quantity Generators

This non-rule policy guidance document is intended to clarify for the public ADEM's interpretation of the rules concerning the training requirements for hazardous waste employees at large quantity generator sites or facilities. It is not intended to replace, limit, or expand upon the complete regulatory requirements found in Division 14 of the ADEM Administrative Code.

The purpose of the Alabama Hazardous Wastes Management and Minimization Act ("AHWMMA") personnel training requirement is to reduce the potential for mistakes and accidents, which might threaten human health or the environment by insuring that facility personnel working in jobs where they handle hazardous waste will be thoroughly familiar with their duties and responsibilities. In this training, employees should be made aware of why they must perform certain tasks in a defined manner. Providing employees with a thorough explanation of how and why certain operations are to be performed should reduce the use of "short-cut" procedures that may lead to noncompliance conditions, accidents, and emergency situations.

In general, the AHWMMA personnel training requirements allow hazardous waste managers to develop and customize the training program so that the level and type of training given is that which is necessary to the facility personnel (supervisory and non-supervisory personnel) to achieve and maintain compliance with the hazardous waste management standards to which the company is subject (e.g., manifesting requirements, marking, labeling, handling and storage of containers, packaging requirements, operating recordkeeping, groundwater monitoring requirements, etc.). Consequently, the hazardous waste manager is required to provide training to facility personnel on how to comply with the types of hazardous waste management activities which are relevant to the positions in which they are employed.

In addition to providing training to facility personnel to insure hazardous waste management compliance, the hazardous waste manager is required to develop the training program so that these personnel are familiar with emergency procedures and are able to effectively respond to an emergency situation. Therefore, all facility personnel assigned to hazardous waste management positions must become familiar with the company's basic emergency procedures as described in the company's hazardous waste contingency plan.

What is Hazardous Waste Training?

As specified in Rule ("r.") 335-14-3-.03(5)(a)4. of the ADEM Administrative Code ("ADEM Admin. Code"), generators that produce 1,000 kg or more of nonacute hazardous waste per month or greater than 1 kg of acute hazardous waste per month (i.e., large quantity generators or "LQGs") may accumulate hazardous waste on site for 90 days or less without a permit or interim status provided that they comply with the personnel training requirements for owners or operators of treatment, storage and/or disposal ("TSD") facilities in ADEM Admin. Code r. 335-14-6-.02(7). In general, training may be defined as a method of preparing an employee to perform a task by providing him/or her with information about the task, a demonstration of its performance, an opportunity for the employee to imitate the demonstration and provide subsequent feedback. Hazardous waste training equips the employee with the knowledge and skills required to manage properly hazardous wastes and to respond appropriately to accidents or emergencies involving hazardous wastes.

Who must be trained?

As mentioned above, all persons responsible for ensuring compliance with ADEM's hazardous waste program regulations, including anyone who reads and interprets the AHWMMA regulations, develops facility procedures, or trains other employees. As stated in ADEM Admin. Code r. 335-14-6-.02(7), facility personnel whose duties have a direct effect on hazardous waste management and/or hazardous waste accumulation, whether by direct contact with the hazardous waste or through hazardous waste management activities, must receive training. This would include, for example, environmental coordinators, hazardous waste manifest preparers, hazardous waste drum haulers or forklift operators, and certain on-site contract employees.

When and how often must training be completed?

Hazardous waste management training must be given to a newly hired employee within the initial six months of employment in a job that involves hazardous waste management or to a current employee within six months of transferring to a position that involves hazardous waste management from a job that did not involve hazardous waste management. In addition, employers are

required to provide its hazardous waste employees with an annual review of the initial training. Training is required as long as the employees occupy jobs that involve regulated hazardous waste management.

What are the basic AHWMMMA training requirements?

As noted earlier, employees must be provided training that enables them to do their jobs safely and in accordance with the applicable regulatory requirements.

Here is a suggested list of AHWMMMA training topics:

- What is an AHWMMMA hazardous waste?
- Classifying hazardous wastes
- Counting hazardous wastes
- On-site storage options (90-day, point-of-generation or satellite accumulation)
- Rules for universal waste and used oil
- Process for meeting land disposal restrictions
- Alternative treatment standards
- Emergency preparedness
- Recordkeeping and reporting
- Preparing the Hazardous Waste Manifest

The above list is not all-inclusive. Ultimately, the LQG is responsible for determining its training needs and then establish and administer a training program that meets those needs.

Who can provide training?

The training program should be administered by a person who is qualified through education or experience in hazardous waste management. Training can be administered by properly trained in-house staff, private sector environmental consulting companies, public sector institutions that specialize in hazardous waste management training, or other persons educated or experienced in such training.

What are the recordkeeping requirements?

The AHWMMMA regulations require LQGs to maintain records of the names, titles, duties, and qualifications of employees involved in hazardous waste management. Specifically, this documentation includes:

1. All job titles for positions at the facility related to hazardous waste management, and the name of each employee filling each job;
2. A written job description for each hazardous waste management position which includes the requisite skill, education, qualifications, and duties assigned to each position;
3. A written description of the type and amount of both introductory and continuing training that will be given to each employee; and
4. Records documenting that all employees have received the required training.

In addition, the AHWMMMA regulations require training records on current personnel to be kept until closure of the facility and the training records on former employees must be kept for at least three years from the date the employee last worked at the facility.

Where can I get additional information?

Here is a partial list of online (Internet) resources that you may find helpful:

- ADEM Administrative Code, Division 14 - <http://www.adem.state.al.us/alEnviroRegLaws/files/Division14.pdf>
ADEM Guidance and Reports - <http://www.adem.alabama.gov/programs/land/guidanceReports.cnt>
- *Biennial Report*
 - *Cathode Ray Tubes*
 - *Environmental Factsheets*
 - *Fluorescent and High-Intensity Discharge Lamps*
 - *Hazardous Waste: The Basics*
 - *Hazardous Waste Determination*
 - *Hazardous Waste Generator Treatment Options*



- *Management of Aerosol Containers*
- *Notification of Regulated Waste Activity*
- *Remediation and Investigation-Derived Waste*
- *Satellite Accumulation Fact Sheet*
- *Small Quantity Generator Handbook*
- *State Manifest Requirements*
- *Used Oil Management Handbook*
- *Waste Disposal Approvals*
- *Waste Transporter Fact Sheet*

EPA RCRA Online Database- <http://www.epa.gov/epawaste/inforesources/online/index.htm>

And, of course, you can reach a Department resource at...



Telephone Resources

ADEM Ombudsman - - - - - 800-533- 2336

Hazardous Waste Compliance Inspectors - - - 334-271-7730



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